



Fish Restoration Program Agreement

Communications & Engagement Plan

To Inform Implementation of the Fish Restoration Program

A joint program between the California Department of Water Resources and
California Department of Fish and Wildlife



Cover: Prospect Island, Sacramento River Deep Water Ship Channel, and Liberty Island (Photo Credit: Dale Kolke)

FRPA Program-Level

Communications and Engagement Plan

*to inform implementation of the
California Department of Water Resources &
California Department of Fish & Wildlife's*

Fish Restoration Program Agreement

Prepared by Kearns & West
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TABLE OF CONTENTS

1. FRPA BACKGROUND AND SCOPE.....	3
1.1. Project Background.....	3
1.2. Project Scope	3
2. PURPOSE AND PROCESS	3
2.1. C&E Plan Purpose.....	3
2.2. How this C&E Plan was Developed.....	4
2.3. The C&E Plan – An Adaptive Approach	4
3. C&E GOALS	4
4. C&E APPROACH AND PRINCIPLES.....	5
4.1. Guiding Principles	5
4.2. Incorporation of Best Practices.....	5
4.3. Tailor C&E Plan Approach to the Requirements of the Restoration Planning Process.....	6
5. COORDINATION WITH KEY PROGRAMS.....	7
6. INTERNAL ENGAGEMENT	7
7. EXTERNAL ENGAGEMENT: AUDIENCES AND COORDINATION.....	8
7.1. Single Point of Contact for Communicating with the Public.....	9
7.2. Stakeholder Contact List.....	9
7.3. Public Comment and Response Management	9
8. KEY MESSAGES.....	9
9. STAKEHOLDER ENGAGEMENT ACTIVITIES.....	10
9.1. Informational Briefings Through Existing Stakeholder Engagement Venues	10
9.2. Informational Briefings with Local Governments and Agencies	11
9.3. Informational Briefings with Landowners and Other Interested Parties	11
9.4. NEPA/CEQA Public Scoping Meetings	12
10. STAKEHOLDER COMMUNICATIONS ACTIVITIES.....	12
10.1. Outreach Content and Materials	12
10.2. Web-Based Outreach	12
10.3. Media Outreach	13
11. ACCOUNTABILITY AND TRANSPARENCY	13
12. SCHEDULE AND MILESTONES.....	14
APPENDIX A: IAP2 SPECTRUM OF PUBLIC PARTICIPATION.....	15
APPENDIX B: FRPA ROLES AND RESPONSIBILITIES/DECISION MAKING CHART	16

1. FRPA BACKGROUND AND SCOPE

1.1. Project Background

The California Department of Water Resources (DWR) and California Department of Fish & Wildlife (CDFW, formerly California Department of Fish & Game, or DFG), collectively referred to as the “Implementing Agencies,” are in the process of implementing the 2010 Fish Restoration Program Agreement (FRPA) to implement specific fish habitat restoration requirements and related actions under the National Marine Fisheries Service (NMFS 2009) salmonid and US Fish and Wildlife Service (USFWS 2008) delta smelt Biological Opinions (BiOps) and the CDFW (2009) longfin smelt Incidental Take Permit for continued State Water Project (SWP) and Central Valley Project (CVP) operations. FRPA is focused on restoring 8,000 acres of intertidal and associated subtidal habitat in the Delta and Suisun Marsh to benefit delta smelt, 800 acres of low salinity habitat to benefit longfin smelt and a number of related actions to restore migratory pathways and juvenile rearing habitat for salmonids in the Yolo Bypass.

1.2. Project Scope

This Communications and Engagement Plan (“C&E Plan” or “Plan”) builds off of and is consistent with the goals and guidelines described in FRPA’s March 2012 [Implementation Strategy](#). According to the Implementation Strategy, the goals of FRPA, as mutually agreed upon by the Implementing Agencies, include:

1. Identify and implement actions that will address the habitat restoration requirements of the USFWS & NMFS Biological Opinions and the CDFW Incidental Take Permit
2. Facilitate interagency planning discussions to achieve the above goal
3. *Facilitate interagency project planning forums to achieve a process that will include public openness and the interests of stakeholders*
4. Incorporate sound science and current available information in developing restoration and enhancement designs
5. Maintain consistency with the Bay Delta Conservation Plan (BDCP), Delta Stewardship Council’s (DSC) Delta Plan, Ecosystem Restoration Program (ERP) strategies, and other large-scale planning efforts in the Delta

This C&E plan is primarily focused on achieving the third goal above (in italics).

2. PURPOSE AND PROCESS

2.1. C&E Plan Purpose

FRPA is an inclusive, system-wide effort that will require extensive coordination between the Implementing Agencies and ongoing engagement with a variety of stakeholders and the general public to identify restoration opportunities and implement restoration planning. The purpose of the C&E Plan is to *guide* FRPA’s concerted stakeholder involvement efforts. The C&E Plan will inform how federal, state and local government agencies, landowners, environmental interests, agricultural interests, local flood management entities, and community members can be involved in implementing the FRPA program. The end-result will be compliance with the USFWS and NMFS BiOps and the CDFW Incidental Take Permit in a way that efficiently and

effectively engages stakeholders in planning for long-term management and stewardship of the properties being restored.

This program-level C&E Plan is focused on the FRPA program at large. For individual restoration projects, separate project-level C&E Plans or materials will be developed. The first of these will be a C&E Plan to guide stakeholder and public involvement for the Prospect Island restoration project.

2.2. How this C&E Plan was Developed

The C&E Plan was informed by outreach recommendations provided by a diverse range of stakeholders obtained through a stakeholder assessment. The assessment was informed by 23 interviews conducted with 25 stakeholders representing a broad array of local government, agricultural, environmental, landowner, state and federal agency, and general public interests. It is intended that the C&E Plan will be responsive to their interests and preferences for participating in FRPA implementation. This C&E Plan was also developed based on Kearns & West's specific experience conducting public outreach activities in the Sacramento-San Joaquin Delta.

2.3. The C&E Plan – An Adaptive Approach

This C&E Plan outlines FRPA's approach to achieving the C&E goals articulated below. It is intended to be a flexible, "living" document that guides effective outreach but is also adaptive to the evolving restoration process. While it will guide communication and engagement activities as written, it will also be updated to reflect changing conditions, internal and external stakeholder needs, and best practices for specific projects and the overall FRPA Program.

3. C&E GOALS

The C&E Plan's overarching goal is to inform, engage, and build stakeholder support toward achieving restoration objectives required by the USFWS and NMFS BiOps and the CDFW Longfin Smelt Incidental Take Permit. The Plan aims to support FRPA implementation so that FRPA may serve as a positive model of fish habitat restoration and enhancements.

Specific goals that the C&E Plan seeks to accomplish include the following:

1. Build stakeholder and broader public understanding of FRPA's Implementation Strategy.
 - This includes understanding of FRPA's objectives and origins, commitment to local involvement and transparency, commitment to long-term stewardship of the land, program merits, restoration process, input opportunities, project funding, and the program timeline.
2. Provide accurate, easy-to-understand, and timely information on ongoing FRPA program activities.
3. Promote communication between stakeholders and FRPA program staff.
4. Describe how the FRPA program relates to other Delta restoration programs, including overlaps and consistencies with other efforts.
5. Coordinate and collaborate early and consistently with interested stakeholders, including potentially affected landowners and governments.

- Recognize locals' on-the-ground knowledge
 - Pursue win-win strategies
 - Demonstrate the State's willingness to listen, compromise and joint problem-solve with stakeholders
 - Establish a process to identify potential restoration projects
6. Prepare internal and external partners for the period before and during the release of the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA) environmental review documents to ensure relevant environmental laws are followed with respect to disclosure and opportunities to comment.
 7. Encourage and solicit agency and public comments on all aspects of the FRPA Program before key decision points, and demonstrate willingness to incorporate public input received in decisions.
 8. Implement the FRPA in a transparent manner.

4. C&E APPROACH AND PRINCIPLES

The C&E Plan draws on industry standards and best practices for outreach and engagement, and will be tailored to the specific phases within the restoration planning process. As noted above, separate C&E approaches will be developed for the FRPA program-level and for specific projects. The program-level plan will guide the specific project-level plans, and the project level plans will include additional, project-specific objectives and activities.

4.1. Guiding Principles

The approach articulated in this C&E Plan is guided by several overarching principles. Key among them:

- This C&E plan should be treated as a living document. It should be updated and revised as situations evolve and lessons are learned.
- C&E activities should be designed to leverage or integrate to the greatest degree possible existing outreach and engagement efforts. Efficiency of engagement is a priority.
- The C&E approach should take place at different scales (e.g., county, interest group, individual landowner, and public), depending on the C&E objective.
- FRPA's outreach approach should address C&E needs both within and outside of the FRPA program (i.e., internal and external stakeholders).

4.2. Incorporation of Best Practices

The International Association for Public Participation's (IAP2) schema for public engagement guides FRPA's C&E Plan (see IAP2 Spectrum of Public Participation in Appendix A). The Plan draws from four core approaches for engaging the public identified therein. These include:

- *Inform*: Provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions
- *Consult*: Obtain public feedback on analysis, alternatives and/or decisions

- *Involve*: Work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered
- *Collaborate*: Partner with the public in identifying preferred solutions

Each of these engagement approaches will be used strategically to achieve the larger C&E goals described above.

4.3. Tailor C&E Plan Approach to the Requirements of the Restoration Planning Process

Restoration process design is a step-by-step process that proceeds conceptually. General and generic steps in the restoration process design are shown below. Communications and engagement will need to be designed and tailored for each step.¹ The current version of this C&E plan is primarily focused on Steps 2-5.



¹ Potential restoration projects in Cache Slough and Suisun Marsh are in different phases/steps of the restoration process. In Suisun Marsh, current emphasis is on how best to reach out to stakeholders and identifying potential properties for acquisition. In Cache Slough, the focus is on developing a Regional Conservation Strategy and reaching out to stakeholders identifying potential properties for acquisition.

5. COORDINATION WITH KEY PROGRAMS

FRPA will coordinate with other related programs as resources allow, particularly when there are overlaps in program milestones (i.e., document review) or C&E activities. FRPA will be mindful of the stakeholders being engaged by related programs, in terms of both interests and geography, and will coordinate with staff from these programs to avoid stakeholder confusion and fatigue. FRPA will leverage other program C&E activities, as appropriate, to solicit input and provide information to stakeholders.

Implementing Agencies will also work with other agencies and programs (e.g. USFWS, US Bureau of Reclamation, NMFS) to solicit scientific and technical review and independent science review of the individual restoration actions, depending on the location of the project.

Key related programs that will be coordinated with include:

- Bay Delta Conservation Plan
- Delta Native Species Recovery Plan
- Delta Science Program
- Delta Stewardship Council Delta Plan
- DRERIP (Delta Regional Ecosystem Restoration Implementation Plan),
- Ecosystem Restoration Program Stage 2 Conservation Strategy
- Interagency Ecological Program (IEP) Management Team
- Overlapping Habitat Conservation Plans and Natural Community Conservation Plans (HCP/NCCPs)
- Sacramento-San Joaquin Delta Conservancy Interim Strategic Plan
- Suisun Marsh Habitat Management, Preservation, and Restoration Plan

6. INTERNAL ENGAGEMENT

Internal outreach with FRPA-related agencies is taking place through the FRPA coordination meetings, which are attended by DWR, CDFW, Reclamation, USFWS, and NMFS. Internal engagement activities are not a major focus of this C&E Plan, although internal agency coordination is described at length in FRPA's Implementation Strategy. It is summarized in this section.

Internal engagement will include coordination with the following agencies:

- Regional government programs focused on Delta restoration and management projects (BDCP; Delta Stewardship Council Delta Plan; Cache Slough Complex Conservation Assessment; Suisun Marsh Habitat Management, Preservation and Restoration Plan; and others – see section 5 above)
- California State agencies (DWR, CDFW, Regional Water Quality Control Board, State Water Resources Control Board other state agencies)
- Federal agencies (NMFS, US Army Corps of Engineers, Reclamation, USFWS)

The FRPA program will have a project-based organizational structure that utilizes teams to implement specific actions and provide implementation, program support and coordination (see

Appendix B for a graphic outline of FRPA internal coordination roles and responsibilities). DWR, CDFW, and potentially other agency personnel will staff the individual project teams, and will report to and receive direction from the Coordination and Management Team. The Coordination and Management Team is composed of staff and lower management personnel from DWR, CDFW, Reclamation, NMFS, and USFWS. The Coordination and Management Team will report directly to the Policy Team, which is composed of upper management personnel from DWR and CDFW. The Project Sponsor, DWR Deputy Director for Delta and Statewide Water Management, will provide overall direction and have decision-making authority for the program.

The Coordination and Management Team and the Policy Team will work with the 5-Agency Group and Implementation Management Team overseeing the Biological Opinions and Incidental Take Permit to ensure coordination and acceptance of FRPA efforts by CDFW, USFWS, and NMFS. In addition, FRPA teams will also work with the BDCP's Fish Agency Strategy Team (FAST) to ensure coordination and acceptance of FRPA efforts where appropriate. Stakeholders, other agencies, and DWR and CDFW legal counsel will also be advising the various teams throughout the implementation process.

7. EXTERNAL ENGAGEMENT: AUDIENCES AND COORDINATION

There are multiple external stakeholders who have a personal or professional stake in implementation decisions and associated restoration planning, or who are otherwise interested in FRPA implementation. FRPA will implement the C&E Plan in a coordinated effort that engages these multiple audiences throughout various outreach and involvement activities. Stakeholders will be interested in both program-level and project-specific FRPA activities.

Target external audiences from the FRPA program-level perspective are listed here; individual project- and location-specific audiences will be identified in project-specific C&E plans.

- Agriculture and farming interests
- Cities and county planning agencies
- Elected officials (state and local)
- Environmental groups
- Flood control agencies
- Landowners
- Media
- Mosquito abatement districts
- Recreational interest groups
- Researchers/academic institutions
- Water agencies and districts
- General public

FRPA will initiate a number of outreach activities and produce outreach materials to accomplish C&E goals and reach out to these audiences. These activities and materials are described in Section 9: Stakeholder Engagement Activities.

7.1. Single Point of Contact for Communicating with the Public

The FRPA Implementing Agencies will identify a single point of contact to serve as the primary source of information and communication with the public. This individual will be the point person for addressing stakeholder questions and inquiries and will effectively “put a face” on the project. This person will be clearly identified on the FRPA website and on FRPA outreach materials.

7.2. Stakeholder Contact List

FRPA will develop a stakeholder contact list that provides information on all interested and affected stakeholders who will need to be engaged with or contacted at various stages in the implementation process. This contact list will include names and roles, and mailing and email addresses and a record of engagement.

This list will also allow the FRPA program to track how it is engaging stakeholders and help note whether any particular groups have not been engaged sufficiently (or have been over-engaged), and adjust accordingly.

7.3. Public Comment and Response Management

A system for managing public comments and responses will be developed to help track all comments received, responses returned, and status of comments. The system will outline issues by topic category to help track all feedback received. A process for reporting back to commenting entities and/or public feedback will be also developed based on the commenting agency and subject matter of the comment to help track and move discussions forward. The system will also track which entity or agency is responsible for resolving the comment, any actions taken, and the status of the response. FRPA staff will have access to the system to incorporate new feedback and to update the status field.

8. KEY MESSAGES

FRPA will incorporate key messages in all of its communications and engagement activities to help ensure clear and accurate understanding about the program and the implementation process. This will ensure a level of consistency across all outreach channels, instill trust in the community and provide the opportunity for FRPA staff to engage with stakeholders and communicate a common message. Key messages about the FRPA program include:

- FRPA is separate from other Delta-area habitat restoration programs.
- If FRPA-related habitat restoration is not implemented, DWR will be in violation of State and Federal regulatory requirements.
- FRPA is willing to work collaboratively with existing land use plans, local governments and restoration efforts. FRPA recognizes locals’ on-the-ground knowledge.
- FRPA is interested in collaborating and coordinating in an active and constructive manner early on with potentially affected landowners and local governments. Safe harbor exists for landowners willing to collaborate with the program.
- FRPA intends to engage with private landowners and willing sellers if the parcels are not already public lands.
- Restoration and agricultural uses can be compatible; restoration does not necessarily decrease property values.

- FRPA is committed to finding a balance between optimizing the restoration benefits and minimizing potential negative impacts.
- FRPA will approach implementation with a sound scientific foundation and acceptance of adaptive management.
- FRPA will coordinate and consolidate its outreach around other existing restoration projects to the extent possible and present updates on FRPA through other existing Delta venues.
- FRPA and Delta restoration are in response to the loss of land and agriculture due to historical water extraction measures, and the program is designed to sustain the future of the Delta in light of past uses.
- FRPA is intended to be a visible and transparent public process, clear about its intentions and process.

9. STAKEHOLDER ENGAGEMENT ACTIVITIES

This C&E Plan will guide the Implementing Agencies to implement consistent and coordinated public involvement and outreach. FRPA seeks to actively solicit information, feedback, and opinions from agencies, entities that have facilities or properties around the project areas, stakeholders, and the general public (see Section 7: External Engagement: Audiences and Coordination) to inform program implementation decisions. To meet this objective, FRPA will engage with stakeholders in new and existing venues. These engagement activities will be at the program-level. Individual project- and location-specific activities will supplement the program-level activities and will be described in supplemental project-specific C&E Plans. The schedule for program-level C&E Plan activities is described in Section 12: Schedule and Milestones.

9.1. Informational Briefings Through Existing Stakeholder Engagement Venues

The Implementing Agencies will share information about the FRPA program and provide progress updates by making presentations at existing Delta and Suisun Marsh restoration-focused, stakeholder engagement venues. FRPA will use these outreach opportunities to open lines of communication with interested and affected stakeholders about the program (including landowners), let them know the future opportunities for input, establish communication channels and receive feedback on the process. The Implementing Agencies will also use these venues to describe the FRPA program within the context of other Delta restoration and related programs, and demonstrate coordination across these programs.

A list of possible venues at which to provide informational briefings that were recommended by stakeholders in the stakeholder interviews is shown below. Venues will be selected based on efficiency and effectiveness in reaching out to stakeholder populations and the general public. Note: The list below contains *potential* venues in which to engage stakeholders; it is anticipated that the Implementing Agencies will provide informational briefings at some but not all of these venues.

- BDCP meetings
- *City Council meetings
- *County Board of Supervisor meetings
- Central Valley Joint Venture meetings

- County Agricultural Advisory Committee meetings
- County Farm Bureau meetings
- Delta Conservancy meetings and public workshops
- Delta Farm Bureau Caucus meetings
- Delta Levees Habitat Advisory Committee meetings
- Delta Protection Commission meetings
- Delta Regional Ecosystem Restoration Implementation Plan meetings
- Delta Stewardship Council meetings
- Duck Club meetings
- Interagency Ecological Program meetings
- Lion's Club meetings (guest speaking opportunities)
- Reclamation District meetings
- Restoration program meetings
 - Bay Delta Conservation Plan
 - Lower Yolo Bypass Planning Forum (if reconvened)
 - Yolo Bypass Fisheries Enhancement Team
 - Yolo Bypass Working Group
 - Suisun Marsh Habitat Management, Preservation, and Restoration Plan
- Resource Conservation District meetings
- Rotary Club meetings
- Sacramento Valley Conservancy meetings
- State and Federal Water Contractors Agency meetings
- Solano County Water Agency meetings
- State of the Estuary Conference
- TMDL Technical Advisory Committee meetings
- Other related programs

*These should be sequenced after FRPA program staff has met with key staff members.

9.2. Informational Briefings with Local Governments and Agencies

FRPA partners will reach out to local government and agency staff early and consistently to inform them and receive input on FRPA activities, better understand their interests and concerns, and coordinate with local planning activities. This activity will better enable local governments and agencies to respond to questions about the FRPA program coming from their own constituents.

9.3. Informational Briefings with Landowners and Other Interested Parties

FRPA will hold informal informational briefings ("meet & greets") targeted to landowners and other local interested parties to share information, build relationships, provide program updates,

educate and solicit more general input. FRPA will make use of existing venues where landowners and other local stakeholders typically meet. FRPA partners will also use these meetings to describe the FRPA program within the context of other Delta restoration and related programs, and demonstrate coordination across these programs.

9.4. NEPA/CEQA Public Scoping Meetings

Public involvement will be sought during the development of the environmental documents necessary to implement any project in compliance with NEPA/CEQA as defined by federal and state law. Stakeholders and the general public will be provided with opportunities to review key project-level documents at scoping meetings, and will be given a reasonable amount of time to review the documents.

Public scoping meetings are held to both exchange information and receive official public comment according to NEPA/CEQA guidelines. Scoping meetings will occur in strategic geographic locations around the FRPA area, notably Yolo and Solano Counties, when FRPA reaches a regulatory milestone. Prior to each public meeting, the appropriate level of public outreach will be initiated (press release, newspaper ads, website information) to inform the public of meeting dates and locations. In addition, meeting announcements will be emailed or mailed to the list of interested stakeholders.

10. STAKEHOLDER COMMUNICATIONS ACTIVITIES

FRPA will develop and disseminate outreach materials that meet the needs of various stakeholders depending on their interest and involvement and their preferred ways of receiving information. These communications activities are at the program-level; individual project- and location-specific activities will supplement program-level activities. The schedule for program-level C&E activities is described in Section 12: Schedule and Milestones.

10.1. Outreach Content and Materials

FRPA will develop clear, consistent and timely informational materials. These materials will help develop public understanding of FRPA, communicate information about FRPA's goals and implementation strategy and how these relate to stakeholder interests, inform the public on how to get involved and motivate stakeholders to contribute to and support FRPA implementation. Outreach materials will be easy-to-understand and visually appealing. They will provide both program-related information and project-specific restoration information as appropriate.

Based on the specific outreach purpose, written materials will include fact sheets, brochures, FAQs, presentations, talking points, maps, and graphics. Outreach materials will be available in printed and website-appropriate form and will be posted to the project website and distributed at meetings and open houses, and/or emailed as e-updates.

10.2. Web-Based Outreach

As FRPA begins implementation and starts to involve a broader range of stakeholders and members of the general public, the importance of its website will increase significantly. FRPA's website will be one of its most important outreach tools and the most important for communicating with the general public; it provides an opportunity to share information and dialogue to those who are interested in FRPA. In order to ensure effective and current communications with interested and involved stakeholders, project-specific content for the website—including written text, graphics, and maps—will be developed.

FRPA will ensure that the FRPA program website remains up-to-date and contains timely information about:

- Status of the FRPA program and restoration planning and implementation activities, including individual projects
- New program activities
- Public opportunities to learn more or provide input
- Key outreach opportunities related to NEPA/CEQA
- Program schedule information
- Links to key documents

10.3. Media Outreach

FRPA staff will identify the preferred media outlets to provide information regarding public meetings, restoration locations, landowner communications, and other issues in accordance with NEPA/CEQA to solicit feedback and participation. Materials include news/press releases, newspaper articles, and media briefings. Media outreach will seek to maximize public understanding through these channels and identify alternative sources through which to convey educational and news items. News releases will announce major project milestones and engagement opportunities. Media releases will be vetted through the proper CDFW and DWR review channels.

FRPA will maintain a list of general regional, state and specialized media, as well as organizational newsletters. Regional print and broadcast media will be a conduit for reaching media that monitor FRPA. Specialized media and newsletters includes publications such as:

- California Farm Bureau and county Farm Bureau publications
- Water agency/organization publications
- Environmental and fisheries publications
- Public interest group publications
- Newsletters of affected parties and stakeholders
- Regional academic publications (e.g. UC Davis)

11. ACCOUNTABILITY AND TRANSPARENCY

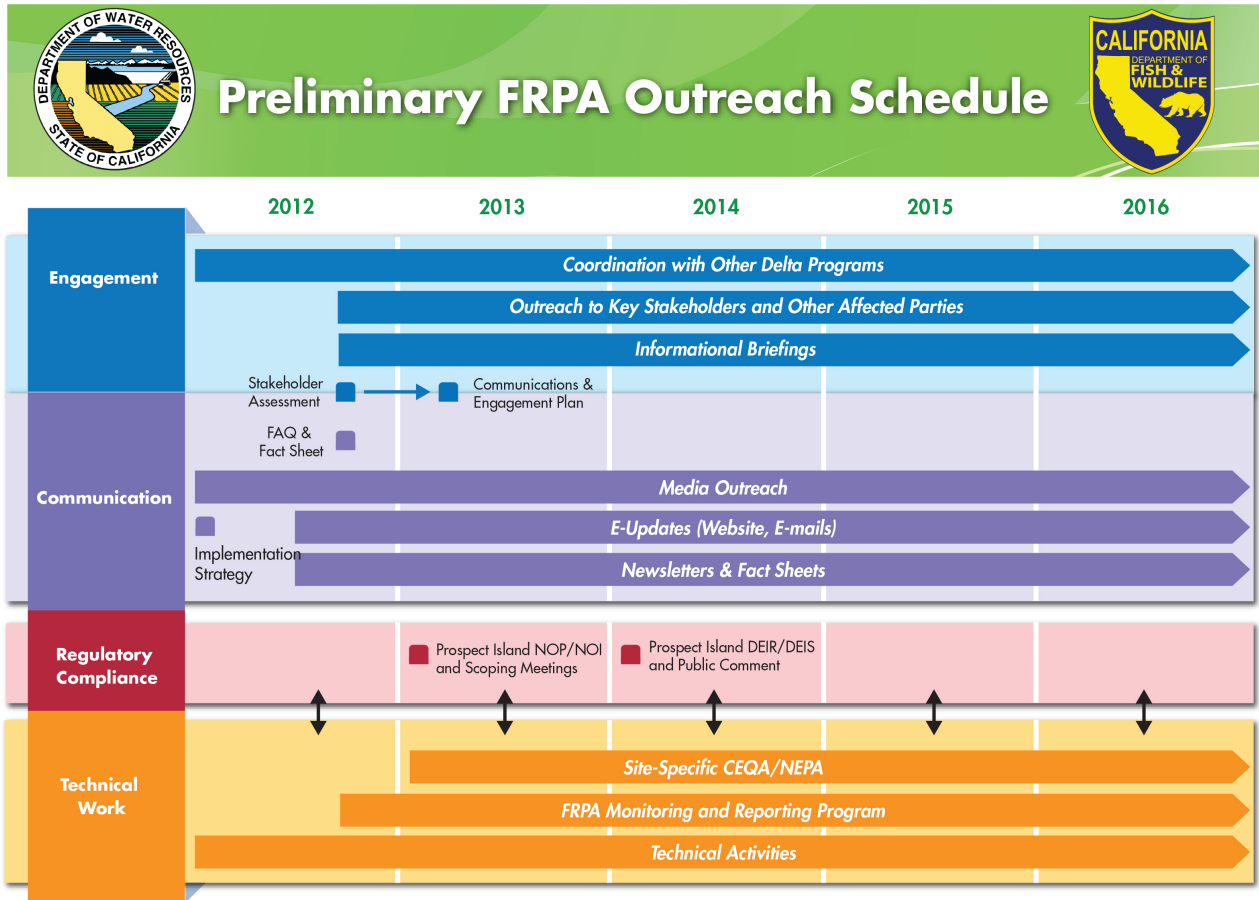
Accountability and transparency are important to the success of the FRPA program. They create an environment by which stakeholder interests in the Delta can engage with confidence to inform implementation of the FRPA program. FRPA partners will adhere to the following practices to help ensure accountability and transparency.

- Advanced notifications of meeting times, locations, and agendas
- Web posting of FRPA program materials
- Broad and timely publicity around review of key documents
- Solicitation of input from stakeholders and good faith effort to incorporate stakeholder interests

Oversight of C&E Plan implementation will be provided by the “FRPA Outreach Team,” which is composed of DWR, CDFW, and consulting team staff. The Outreach Project Team will meet monthly to track and assess the effectiveness of C&E Plan activities. The Outreach Team will make changes to the C&E Plan as needed to ensure achievement of the C&E Plan’s goals, while adhering to the principles outlined in the C&E Plan.

12. SCHEDULE AND MILESTONES

The graphic below outlines a preliminary FRPA outreach schedule along with some key milestones. This schedule will be updated over time.



For more information, please visit:
<http://www.dwr.water.ca.gov/environmentalservices/frpa.cfm>

APPENDIX A: IAP2 SPECTRUM OF PUBLIC PARTICIPATION

IAP2 Spectrum of Public Participation



International Association
for Public Participation

Increasing Level of Public Impact

	Inform	Consult	Involve	Collaborate	Empower
Public participation goal	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision-making in the hands of the public.
Promise to the public	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.
Example techniques	<ul style="list-style-type: none"> ■ Fact sheets ■ Web sites ■ Open houses 	<ul style="list-style-type: none"> ■ Public comment ■ Focus groups ■ Surveys ■ Public meetings 	<ul style="list-style-type: none"> ■ Workshops ■ Deliberative polling 	<ul style="list-style-type: none"> ■ Citizen advisory committees ■ Consensus-building ■ Participatory decision-making 	<ul style="list-style-type: none"> ■ Citizen juries ■ Ballots ■ Delegated decision

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APPENDIX B: FRPA ROLES AND RESPONSIBILITIES/DECISION MAKING CHART

Fish Restoration Program Agreement

Roles & Responsibilities/Decision-making Chart

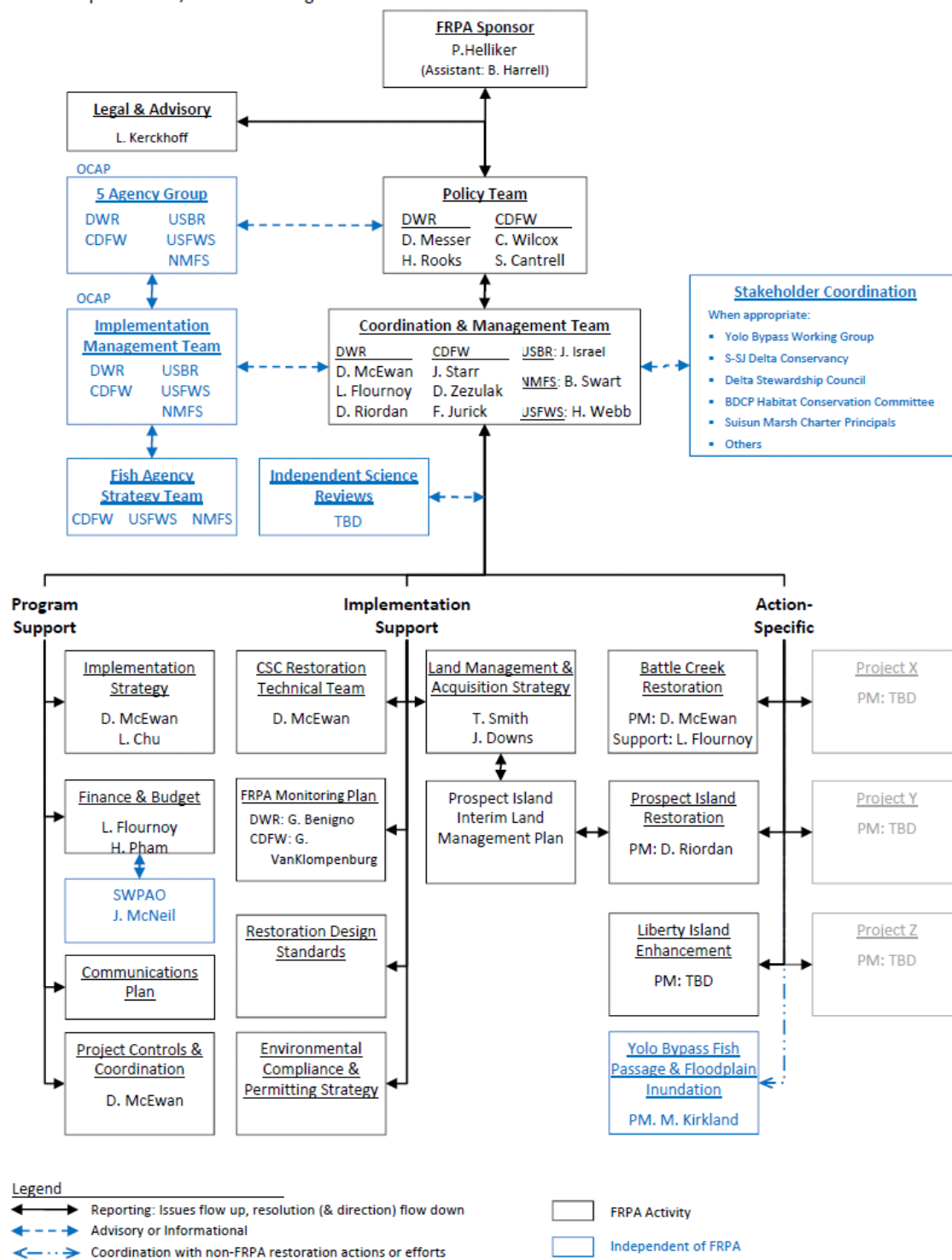


Figure 1. Roles, responsibilities, and coordination of FRPA

